

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

MARTIN J. WALSH, )  
SECRETARY OF LABOR )  
U.S. DEPARTMENT OF LABOR, )  
Plaintiff, )  
v. ) CIVIL ACTION FILE  
PACKERS SANITATION SERVICES, )  
INC., LTD., ) NO. 4:22-CV-03246  
Defendant. )

**DEFENDANT'S MOTION FOR  
EXPEDITED DISCOVERY, SCHEDULING ORDER, AND  
CONTINUANCE OF PRELIMINARY INJUNCTION HEARING**

Pursuant to Rules 16, 26, and 65 of the Federal Rules of Civil Procedure and the Court's inherent powers, Defendant Packers Sanitation Services, LLC ("PSSI" or "the Company") requests that the Court enter an order providing three things: (1) limited, expedited discovery as detailed below to prevent extreme prejudice to Defendant; (2) a scheduling order with certain provisions relating to witness and exhibit lists, including the identification and exchange of witness information (including any purported experts) and documents for use at the preliminary injunction hearing; and (3) a short extension of the date for preliminary injunction hearing to ensure a fair hearing in this matter.

WHEREFORE, for the reasons set forth in its Brief in Support of this motion and the accompanying exhibits, PSSI respectfully requests that the Court enter an Order consistent with the relief requested in this motion.

Respectfully submitted,

/s/ J. Randall Coffey

J. Randall Coffey

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ATTORNEYS FOR DEFENDANT  
PACKERS SANITATION SERVICES, LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 16<sup>th</sup> day of November, 2022, the foregoing was filed via the Court's Electronic Filing System and service made via the same, to:

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